

PHILLIP A. TALBERT  
United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation, Office 7  
MARGARET BRANICK-ABILLA (CABN 223600)  
Special Assistant United States Attorney  
Office of Program Litigation, Office 7  
Office of the General Counsel  
Social Security Administration  
6401 Security Boulevard  
Baltimore, MD 21235  
Telephone: (510) 970-4809  
Email: Margaret.Branick-Abilla@ssa.gov

Atorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

GUADALUPE ESPARZA CARBAJAL,

Civil No. 1:23-cv-00319-BAM

Plaintiff,

vs.

KILOLO KIJAKAZI, Acting Commissioner of Social Security,

STIPULATION AND [PROPOSED] ORDER  
FOR EXTENSION OF TIME

Defendant.

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 30 days, from August 30, 2023 to September 29, 2023, for Defendant to file her Cross-Motion for Summary Judgment. All other dates in this Court's Scheduling Order shall be extended accordingly.

This is Defendant's first request for an extension of time. Plaintiff's counsel does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to ongoing staffing fluctuations and organizational changes, the undersigned counsel for the Commissioner has been tasked with additional duties including serving as a jurisdictional coordinator, reviewing other attorneys' work, training new attorneys, and handling more cases, including the above-captioned matter. Counsel for the Commissioner will also be out of the office on pre-planned leave during the last week of August. As a result, and despite diligent efforts to comply with this Court's Scheduling Order, counsel for the Commissioner needs an extension in the instant case to review the administrative record, consider the issues that Plaintiff has raised, confer with her client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: August 21, 2023

## PENA & BROMBERG, PLC

By: /s/ Jonathan O. Pena\*  
JONATHAN O. PENA  
Attorney for Plaintiff  
[\*as authorized by email on Aug. 21, 2023]

Dated: August 22, 2023

PHILLIP A. TALBERT  
United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation, Office 7

By: /s/ Margaret Branick-Abilla  
MARGARET BRANICK-ABILLA  
Special Assistant United States Attorney  
Attorneys for Defendant

## ORDER

Pursuant to the parties' stipulation, and cause appearing, Defendant shall have an extension, up to and including September 29, 2023, to submit her Cross-Motion for Summary Judgment. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: August 22, 2023

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE